

First Name	Last Name	Organization	COMMENT	RESPONSE
Y'Anad	Burrell	Resident, CSC co-chair, Glasshouse Communications	Delete words "click here to enter text" (pg. 99).	Comment is respectfully noted.
Y'Anad	Burrell	Resident, CSC co-chair, Glasshouse Communications	Question: Marine and Rail 1.3 (pg. 104) - What is "find and fund"? Please define.	Comment is respectfully noted.
Y'Anad	Burrell	Resident, CSC co-chair, Glasshouse Communications	Question: Marine and Rail 1.3 (pg. 104) - What is "find and fund"? Please define.	Comment is respectfully noted.
Y'Anad	Burrell	Resident, CSC co-chair, Glasshouse Communications	Question: Public Health 2.1 and 2.2 - 'Support' meaning?	Comment is respectfully noted.
Todd	Osterberg	Chevron	Figures 6-9 and 1-10 are missing legends.	Comment is respectfully noted.
Leticia	Chavez	North Richmond resident	Resident for 20 years. Difficult to report smells to BAAQMD since don't know exact address of smells of burnt plastic. Garbage dump? Refinery? How can I hear progress about complaints?	Please report any air quality complaints either online or by phone. For more information, please visit https://www.baaqmd.gov/online-services/air-pollution-complaints/air-quality-complaint-program .
Priya	V	Richmond resident	Wastewater data can show us prevalence of covid, flu, RSV, etc.	Comment is respectfully noted.
Priya	V	Richmond resident	Clean air includes indoor air. Covid and disease prevention/mitigation through clean air must be part of this comprehensive air pollution plan. These viruses pollute the air we breathe.	Please see Health strategy 2 and 4.
Priya	V	Richmond resident	Need better ventilation in public spaces, especially for disabled, BIPOC, low-income, houseless, who have less access to PPE. Ensure availability of masks.	AB 836 Wildfire Smoke Clean Air Centers for Vulnerable Populations Incentive Pilot Program aims to address this concern by providing portable air filtration units or HVAC upgrades to publicly accessible sites (i.e. community centers, libraries, schools, homeless shelters, etc.) located in frontline communities. For more information on how the Air District is implementing this program, please visit baaqmd.gov/cleanaircenters .
Priya	V	Richmond resident	Vision statement discusses severe health risks from pollution. Why can't Covid be included?	While the Plan doesn't explicitly address COVID, there are many strategies, such as Health strategy 2 that supports progress towards improved indoor filtration. There is evidence that suggests that better indoor filtration can prevent COVID.

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Priya	V	Richmond resident	Need to improve ventilation standards in public spaces.	AB 836 Wildfire Smoke Clean Air Centers for Vulnerable Populations Incentive Pilot Program aims to improve ventilation in public spaces found in frontline communities during a wildfire or other smoke event by outfitting them with portable air filtration units or an HVAC upgrade. For more information on how the Air District is implementing this program, please visit baaqmd.gov/cleanaircenters .
Scott	Gelfand	Richmond resident	Educate Richmond residents on individual emission health risks.	Comment is respectfully noted.
Jaime	Perez	Richmond resident	Enhance understanding of individual emission health risks. How does sulfuric acid compare to PM2.5?	Please see Health strategy 6.
Gary	Hurlburt	President and Executive Director, Richmond Tennis Association	Education and information sharing to residents of plans and progress toward goals.	Comment is respectfully noted.
Suzanne	Coffee	CSC member	Many people living in the project area, myself included, are unaware of the extent and affects of air pollution in our community. I believe in order to continue to improve air quality and hold polluters accountable we will have to have a greater demand for change from the public. I believe the engagement and education of the public as strategy will be a driver of many of the changes that will lead to cleaner air in our future.	Comment is respectfully noted.
Martha	Gruelle	Resident	Discussions of toxic air contaminants and their health effects get very technical, very fast. The Richmond community has a right to plain-English (and Spanish) explanations of what we are facing when we breathe every day.	Comment is respectfully noted.
Emily	Adamson	Physician at Lifelong Medical's William Jenkins Clinic	My heart aches for the kids I see daily in clinic with preventable chronic health conditions. Expresses extreme support for the Path to Clean Air.	We appreciate you sharing your personal experience working in the Path to Clean Air area. Thank you and your comment is respectfully noted.
Suzanne	Gordon	Point Richmond resident	Many residents suffer from chronic health conditions that are refinery related.	Comment is respectfully noted.

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Floy	Andrews	Attorney in Richmond, CA	I wander outside in the late or early hours of the night and notice a strong and pungent odor. What is the cause? Why only in the dead of night? I have never experienced such odors living anywhere but here, next to Chevron.	We appreciate you sharing your personal experience working in the Path to Clean Air area. Please report any air quality complaints either online or by phone. For more information, please visit https://www.baaqmd.gov/online-services/air-pollution-complaints/air-quality-complaint-program .
Brenda	Illescas	Resident	Suffers asthma with two children.	We appreciate you sharing your personal experience living in the Path to Clean Air area. Thank you, and your comment is respectfully noted.
Brenda	Illescas	Resident	Concerned about exposure to harmful air quality caused by Chevron and car traffic in my community.	We appreciate you sharing your personal experience living in the Path to Clean Air area. Thank you, and your comment is respectfully noted.
Jan	Mignone	Richmond resident	Diagnosed with asthma in Richmond.	We appreciate you sharing your personal experience working in the Path to Clean Air area. Your comment is respectfully noted.
Suzanne	Gordon	Point Richmond resident	Resident for close to 12 years. PTCA ignores the fact that Chevron neighbors are exposed to toxic pollutants (sulfuric acid, nickel, manganese, hydrogen, cyanide, hydrochloric acid, formaldehyde, arsenic, benzene, and cadmium) at a level not found in other places.	Please see Fuel Refining strategy 4.
Steve	Early	Richmond resident, author of Author of Refinery Town: Big Oil, Big Money, and the Remaking of an American City (Beacon Press, 2017)	Need to improve community engagement; plan not aspirational enough. Chevron Refinery. Has experienced oil spills, fouled beaches, flaring, fires. Resident of 12 years. Richmond Residents very concerned at recent City Council meeting.	Comment is respectfully noted.
Suzanne	Gordon	Point Richmond resident	BAAQMD should be partnering with other state and federal agencies on further research on the specific health impacts of the worst TACs - sulfuric acid, nickel, manganese, hydrogen, cyanide, etc.	Please see Health strategy 6.
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Request CARB and OEHHA review the current state of basic health research for our ten highest impact pollutants.	Comment is respectfully noted.

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Floy	Andrews	Attorney in Richmond, CA	No clear understanding of the impacts of so many other toxic contaminants refineries release into the air.	Please see Health strategy 6.
Jaime	Perez	Richmond resident	No serious plan to improve our understanding of the true impacts of toxic air contaminants.	Please see Health strategy 6.
Floy	Andrews	Attorney in Richmond, CA	Haven't demanded adequate investment in research to understand how these chemicals, independently and especially in combination, impact human health. Where is the science?	Please see Health strategy 6.
Jan	Warren	Resident (Walnut Creek)	It would have been helpful at the recent January 11 workshop a way could have been allowed to add public comments that were actually kept. I couldn't find my notes.	Comment is respectfully noted.
Jeannette	Kortz	Unknown	Plan needs to force Chevron to participate actively in this emissions reduction process.	Please see accountability actions in Fuel Refining strategy 3.
Scott	Gelfand	Richmond resident	Force Chevron to participate actively in this planning process, or be fined.	Please see accountability actions in Fuel Refining strategy 3.
Steve	Early	Richmond resident	Chevron continues to obfuscate plans. BAAQMD should give no slack, especially on issues like flaring reduction.	Please see accountability actions in Fuel Refining strategy 3.
Brent	Green	Unknown	Better help for major project reviews.	Please see Land Use strategy 1 which notes local planning departments as key partners that can help with coordinating better project review.
Brent	Green	Unknown	Chevron MUST partner to address urgent public health issues from emissions.	Please see accountability actions in Fuel Refining strategy 3.
Jaime	Perez	Richmond resident	Force Chevron senior management to participate.	Please see accountability actions in Fuel Refining strategy 3.
Joseph	Puleo	Resident	BAAQMD failed to require Chevron to mitigate the dangerous effects until 2021 when it required Chevron to install wet scrubbers to reduce these pollutants. CBE had requested BAAQMD do so in 2014 but its request to install said scrubbers was ignored.	Please see accountability actions in Fuel Refining strategy 3.
Gail	Eierweiss	Resident	Why is court battle against the Cat Cracker wet scrubber rule being handled behind closed doors with little public input or organized pressure for "the system" to do the right thing? Need community involved to combat Chevron's delaying tactics. Buses full of people going to Sacramento to demand this delay put to an end. Same thing for shore power.	Please see accountability actions in Fuel Refining strategy 3.

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Jenny	Delumo	Resident	I hope that once the implementation plan is complete the decision making bodies of the affected communities within the CERP boundary take up this work with haste and full support.	Comment is respectfully noted.
Jenny	Delumo	Resident	Overall, include strategy metrics that track whether implementation of the action led to more equitable outcomes.	All of the strategies in Chapter 7 include action specific metrics (see Appendix A).
Alison	LaBonte	A la bonte advisors	Who will fund DRAFT Plan actions?	Many strategies note particular funding sources (such as incentives and grants). Further work to detail funding pathways will be developed during implementation as discussed in Chapter 9.
Floy	Andrews	Attorney in Richmond, CA	Getting funding from the US EPA for this work is critical. It should be a top priority for BAAQMD, senior management at Cal EPA, CARB and OEHHA.	Many strategies note particular funding sources (such as incentives and grants). Further work to detail funding pathways will be developed during implementation as discussed in Chapter 9.
Floy	Andrews	Attorney in Richmond, CA	I believe the polluter should bear a substantial portion of the cost of this effort.	Many strategies note particular funding sources (such as incentives and grants). Further work to detail funding pathways will be developed during implementation as discussed in Chapter 9.
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	What's the budget for all of this?	Many strategies note particular funding sources (such as incentives and grants). Further work to detail funding pathways will be developed during implementation as discussed in Chapter 9.
Laurie	Swiaddon	East Richmond Heights resident	Create a new tax to provide for installation of EPA-certified fireplace inserts for everyone who requests one.	Please see Health action 2.5. Additionally the Air District will be administering the Clean Heating Efficiently with Electric Technology (CleanHEET) Program providing up to \$2 million throughout the Bay Area for the changeout of freestanding wood stoves or wood-burning fireplace inserts with electric heat pumps.
Tarnell	Abbott	Richmond resident	What kind of regulations can be imposed on Chevron to “create a healthy breathing environment”? The draft plan doesn't show how we reduce PM2.5, NOx, and toxic air contaminants by 40%.	Please see Fuel Refining actions 4.2 and 4.5.
Tarnell	Abbott	Richmond resident	There are no milestone steps and it just seems too fuzzy and uncertain. Do we need to limit exports or force Chevron to use cleaner feedstocks to get to a 40% reduction?	Comment is respectfully noted.

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Gary	Hurlburt	President and Executive Director, Richmond Tennis Association	Chevron need aggressive plans for identifying the extent and reduction of dangerous pollutants.	Comment is respectfully noted.
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	Lack of specific emission targets for Fuels and Refining. Urge for higher goals. Instead of 30-50% PM2.5 reduction by 2034, need 50% or more by 2030.	Comment is respectfully noted.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Adopt a plan to cut refinery emissions by substantial percentages (up to 50% minimum was used in WCWLB).	Please see Fuel Refining strategy 4 objective which includes reducing the exposure burden from toxic air contaminants (TACs) to the lowest level feasible and reducing toxicity-weighted emissions (TWE) from the fuel refining sector with a goal of a 30-50% reduction before 2035.
Jan	Warren	Resident (Walnut Creek)	Under #5 actions rephrase the objective to reduce the fuel refining section by 30-50%, to breakdown the term fuel refining to VOCs, TACs, GHGs, with each of their own target percentage reductions. Add a baseline to measure the reductions by 2035.	Fuel Refining strategy 4 objective considered different metrics and selected Toxicity Weighted Emissions.
Jeannette	Kortz	Unknown	Plan needs to reduce the top toxic contaminants by 30-40% with milestones between now and 2035.	Please see Fuel Refining strategy 4 objective which includes reducing the exposure burden from toxic air contaminants (TACs) to the lowest level feasible and reducing toxicity-weighted emissions (TWE) from the fuel refining sector with a goal of a 30-50% reduction before 2035.
Scott	Gelfand	Richmond resident	Reduce toxic contaminants all together! You can't poison children and older adults and think it's their fault for living there. The business must be held accountable for their emissions.	Comment is respectfully noted.
Jaime	Perez	Richmond resident	Provide a full plan for a 30-40% reduction in the toxic contaminants causing chronic health problems by 2035, with clear milestones and critical success factors.	Please see Fuel Refining strategy 4 objective which includes reducing the exposure burden from toxic air contaminants (TACs) to the lowest level feasible and reducing toxicity-weighted emissions (TWE) from the fuel refining sector with a goal of a 30-50% reduction before 2035.
Jaime	Perez	Richmond resident	Issues with Current Plan: Lack of specific target reduction numbers and inadequate discussion of critical success factors.	Comment is respectfully noted.

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Jaime	Perez	Richmond resident	Unanswered questions regarding the feasibility of achieving reduction goals.	Comment is respectfully noted.
Martha	Gruelle	Resident	There are high levels of multiple toxics from the refinery. We need a serious plan to reduce the most dangerous rather quickly. Chevron needs to take positive action on this, whether or not they find it convenient.	Comment is respectfully noted.
Priya	V	Richmond resident	Need coordinated effort with the public health sector.	Please see Health strategy 5, many of the public-health related actions call out specific health agencies as key partners.
Martha	Gruelle	Resident	Richmond City Council also provided comments, in the form of a council resolution, in May 2023. At the very least, these comments from our elected leaders should be thoroughly addressed in the final report.	Comment is respectfully noted.
Jaime	Perez	Richmond resident	Need for a better working relationship with Chevron and creative approaches to ensure cooperation.	Please see accountability actions in Fuel Refining strategy 3.
Maureen	Brennan	Hazmat Commissioner	Hazmat commission should support AB617.	Comment is respectfully noted.
Jan	Warren	Resident (Walnut Creek)	Name the role BAAQMD can play to bring members of the community, labor, and industry together to address how to move to renewable energy, maintain living wage jobs, and improve the health of the community?	Chapter 9 discusses the role of the Air District during implementation.
Y'Anad	Burrell	Resident, CSC co-chair, Glasshouse Communications	Public Health 1.3 (pg. 112) - The plan is asking a county health system to move the dial on a state-wide (California) healthcare program. This is worded in a way to 'assume' if there is no movement, then CCHS did not make an effort to support this strategy.	As noted in Chapter 7, the Health Strategies call on a variety of agencies to implement the actions; Chapter 9 notes the many agencies whose partnership will be needed to ensure success.
Y'Anad	Burrell	Resident, CSC co-chair, Glasshouse Communications	Public Health (Strategy 4: Table/Narrative on how section): When the word 'government' is mentioned, in most contexts, there is an immediate connotation that nothing will get done. To have this wording as part of the 'success' of this strategy does not give hope to the community that it will happen. Additionally, to say that 'depending on Air District staff capacity' further discourages that this strategy has hope of even happening. Community and community partners are always willing so more emphasis should be put on their involvement in the success of this strategy.	As noted in Chapter 9, the community will have a critical role in implementation.

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Sally	Tobin	Resident	Hope to accelerate plan process since people are suffering.	Strategies in Chapter 7 and detailed actions in Appendix A include estimated implementation timelines.
Joseph	Puleo	Resident	There must be a hard timeline to achieve this result with periodic goals along the way.	The strategies in Chapter 7 and detailed actions in Appendix A include estimated implementation timelines.
Jan	Warren	Resident (Walnut Creek)	Need more specific timelines for actions.	Strategies in Chapter 7 and detailed actions in Appendix A include estimated implementation timelines.
Jan	Warren	Resident (Walnut Creek)	Under #4 actions on page 100, add/rephrase “during the year after final adoption of PTCA work to put a timeline on the action implementation statements.	Strategies in Chapter 7 and detailed actions in Appendix A include estimated implementation timelines.
Steve	Early	Richmond resident, author of Author of Refinery Town: Big Oil, Big Money, and the Remaking of an American City (Beacon Press, 2017)	Need to improve community engagement.	As noted in Chapter 9, the Community Engagement Standing Committee will continue to conduct outreach and education on the PTCA Plan during implementation.
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	Strongly encourage BAAQMD to present the plan within one week of releasing the draft and expand the public comment window beyond 30 days to ensure the public has enough time to thoroughly read, digest, and comment on hundreds of pages of dense content.	Comment is respectfully noted.
Gail	Eierweiss	Resident	Plan is 700 pages, overwhelming; need clear way to understand total plan and how it will deliver our goals; need: (1) Better slide deck that is simpler and more focused on goals, milestones, and critical success factors - Richmond City Council is great forum for presenting the plan; (2) Summary table added that allows the reader to see all of the emission reduction strategies together (with milestone reduction goals) and all of the non-emission reduction strategies in another. No more than 5 or 6 pages.	Comment is respectfully noted.
Jan	Warren	Resident (Walnut Creek)	Find more ways to go to where the people meet. Pay community ambassadors to educate, listen, and find out what people most need and want. Then seek grants and work with the community to implement the programs.	Comment is respectfully noted.

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Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Add two Strategy Summary tables, one for emission reduction strategies and the other for all other strategies. Make 8-10 pages. Each row should include a clear description, key implementation milestones, critical success factors, funding requirements, and responsible agency.	Comment is respectfully noted.
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Schedule a presentation of the final CERP to Richmond City Council by BAAQMD's CEO.	Comment is respectfully noted.
Jan	Warren	Resident (Walnut Creek)	Implement as part of BAAQMD outreach to engage and give stipends to young adults in the community to engage with the community on what they're experiencing that is affecting their health. Document and share with BAAQMD for follow-up how to address.	Comment is respectfully noted.
Jaime	Perez	Richmond resident	No recognition of past failures or the need for new ideas. BAAQMD missed the impact of the "Modernization" project on public health. While attempting to improve these rules and strengthen penalties, we should also explore legislative measures that are more resistant to delay.	Please see accountability actions in Fuel Refining strategy 3.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Air District should adopt more sensitive methane detection methods.	Please see Fuel Refining strategies 2 and 3, actions 2.4. 3.13. 3.14 focused on improving emissions and air monitoring for refineries and other related facilities that will consider the use of different types of monitoring technologies.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend that CSC request that BAAQMD perform regular and frequent VOC monitoring of sites that process plastics or use solvents or other petrochemicals in their processes.	Please see Fuel Refining strategies 2 and 3, actions 2.4. 3.13. 3.14 focused on improving emissions and air monitoring for refineries and other related facilities. In addition, the District will be considering any possible follow-up actions related to findings of emissions from commercial or industrial sources from the CAMP Air Toxics monitoring project (see Commercial & Industrial action 5.3).

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Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend that the Air District and CSC ask the CA Dept of Public Health what improvements in air monitoring they suggest	The Air District coordinates routinely with other agencies in California and nation-wide to ensure we have the most up to date information about what monitoring methods are working best for various purposes. Specifically CDPH has provided comments that we have included in previous air monitoring network assessments, along with those from other air quality researchers.
Jan	Warren	Resident (Walnut Creek)	Portable H2S monitors could be used in neighborhoods that are consistently reporting these types of experiences. Monitoring in general needs lots of improvements. Seek a grant to get handheld monitoring units for people to borrow for a week or two at a time to use in their kitchen to test the indoor health. Have them document on a created form the results. For those who participate and have asthma, help them fill out forms to get clean air filtering devices, etc.	Please see Fuel Refining strategies 2 and 3, actions 2.4. 3.13. 3.14 focused on improving emissions and air monitoring for refineries and other related facilities that will consider the use of different types of monitoring technologies.
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	Urge BAAQMD to update refinery regulations across all Bay Area Air District jurisdiction, not just in PTCA Area.	Comment is respectfully noted. Air District regulations apply across the Bay Area jurisdiction (not just to a specific area), so any updates to any of the Air District regulations would inherently be applied more broadly.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Follow suit of Wilmington Carson West Long Beach (WCWLB) CERP, urge CSC, BAAQMD, and CARB to advocate that measures adopted in one community be replicated in others.	Comment is respectfully noted.
Sally	Tobin	Resident	Chevron would have be proactive about their plans to deal with sea level rise. Engage an independent and reputable company to assess and characterize toxic sites on the entire Chevron property (not merely the refinery).	Comment is respectfully noted.
Sally	Tobin	Resident	Chevron present a public plan to protect both San Francisco Bay and San Pablo Bay from being poisoned by mobilization of toxins as sea levels rise and flood contaminated areas.	Comment is respectfully noted.
Jeannette	Kortz	Unknown	Plan needs to reduce flaring 75% by next year.	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.

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Steve	Early	Richmond resident	Richmond City Council urged to develop a plan that would reduce flaring by 75%, in accordance with Chevron "Modernization Project (2014)".	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.
Jaime	Perez	Richmond resident	Provide a plan to reduce flaring by 75% by 2025 or 2026, aiming for industry best practice levels.	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.
Jaime	Perez	Richmond resident	Insufficient milestones and clarity on Chevron's obligation to reduce flaring events.	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.
Tarnell	Abbott	Richmond resident	Where is the plan to reduce flaring to a minimum such as 5 to 7 incidents per year instead of 20 plus?	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.
Gary	Hurlburt	President and Executive Director, Richmond Tennis Association	The need for specific goals and timelines and action plans necessary to achieve those flaring goals.	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.
Gary	Hurlburt	President and Executive Director, Richmond Tennis Association	75% reduction in the number and extent of the flares.	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.

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Joseph	Puleo	Resident	Demand at least an 80% reduction in flaring and a large reduction in toxic air contaminants.	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	Appreciate BAAQMD updating flaring regulations.	Comment is respectfully noted.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend the adoption of refinery flaring prevention measures such as: improve Flare Minimization Plans; tighten requirements to carry out root cause analysis; impose much higher fines; ensure refineries have sufficient compressor capacity; slow down planned flaring; and provide better public access to flaring data, and other measures.	Please see Fuel Refining actions 2.2, 2.4, 2.5, 2.6, and 3.15.
Gail	Eierweiss	Resident	Plan for 75% reduction in flaring at Chevron by 2026 (request was made by Richmond City Council in May) the PTCA has no specific plans or goals; need aggressive plan to bring flaring down to level equal to or lower than pre-modernization project levels What are best practice numbers for refinery flaring incidents? what are standards in Europe and Japan?	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.
Jan	Warren	Resident (Walnut Creek)	While the flaring rule was originally incorporated as a safety feature, it has become an excuse to hide causes. Add to this plan that within a specific period of time the location, date of flaring, notice when BAAQMD was notified, amount of fine, date and specific action(s) taken to remedy the cause of flaring. This information should be easily available to the public and the incident updated.	Please see Fuel Refining strategy 2 actions.
Martha	Gruelle	Resident	Flaring at the refinery is quite frequent and has increased. We need a full accounting of the effects of these events, and we need action by Chevron to greatly reduce the number of flaring events to industry-low levels.	Please see Fuel Refining strategy 2 for detailed actions focused on flaring.
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Faster Development of tougher Flaring Rule amendments with goals.	Comment is respectfully noted.

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Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Discuss 75% reduction in annual flaring events with Chevron senior management.	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring.
Sally	Tobin	Resident	Chevron to initiate a series of public meetings to explain the reasons for the huge increase in recent flaring activity.	Please see Fuel Refining actions 2.2, 2.4, 2.5.
Jan	Warren	Resident (Walnut Creek)	Make inspection documents public (of sources: freeways, ports, rail and large industrial plants).	Air District inspection reports on stationary sources are available by making a Public Records request at: https://www.baaqmd.gov/contact-us/request-public-records . Requests for mobile source inspection reports can be obtained through CARB at: https://ww2.arb.ca.gov/guidelines-accessing-public-records .
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend Air District install CCD cameras pointed at refinery flare stacks.	Please see Fuel Refining strategy 2 actions 2.2, 2.4 and 2.5 focused on providing more information and improve communication during and after incidents. Input on Fuel Refining action 2.5 can be made through the PTCA CSC or directly to the District Board of Directors as they work to improve the District's incident response program.
Steve	Early	Richmond resident	BAAQMD doesn't know what pollutants are being emitted or what the possible health impacts really are. No clear plan for Chevron to have flaring reductions, just vague commitment to have a plan in the future.	Please see Fuel Refining strategy 2 objective which includes reducing flaring events to the lowest levels possible (in terms of frequency and emissions), including during emergencies/upset, via more consistent and competent operations, with an ultimate goal of zero routine or planned flaring. Please see Fuel Refining actions 3.14, 3.14 and other strategies that consider the review of emissions monitoring also are expected to improve the characterization of emissions from fuel refining and other facilities.

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Janet	Johnson	Co-coordinator, Sunflower Alliance	Air District should make sure that all complaints of reported (and possible) particulate matter depositions are followed up with CAM-17 testing.	Please see Fuel Refining strategy 2 actions 2.2, 2.4 and 2.5 focused on providing more information and improve communication during and after incidents. Input on Fuel Refining action 2.5 can be made through the PTCA CSC or directly to the District Board of Directors as they work to improve the District's incident response program. Please also see Fuel Refining actions 3.13, 3.14, and 3.15 which also aim to improve emissions and air monitoring, as well as data reporting, for day to day emissions from fuel refining facilities.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend that the Air District and CSC ask how CA Dept of Public Health can better follow up with a community for "harm" after a suspected dust release at a contaminated site.	Comment is respectfully noted.
Claudia	Citroen	Richmond resident	Plan lacks evidence based on chemical analysis of accumulated substances in residential homes' furnace filters. HVAC filter turned black during recent Chevron incidents (photo included). Will we be willing to expand data collection and include analyzing of HVAC filters in impacted homes?	Please see Fuel Refining strategy 2 actions 2.2, 2.4 and 2.5 focused on providing more information and improve communication during and after incidents. Input on Fuel Refining action 2.5 can be made through the PTCA CSC or directly to the District Board of Directors as they work to improve the District's incident response program.
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	BAAQMD should carry out a Fluxsense study like SCAQMD, which corrected the historic underestimation of emissions. Should be done for Chevron and other refineries in the Bay Area.	Please see Fuel Refining strategies 2 and 3, actions 2.4., 3.13., and 3.14, focused on improving emissions and air monitoring to better characterize emissions from refineries and other related facilities, including fugitive emissions from leaks) that will consider the use of Fluxsense and other technologies.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend that BAAQMD carry out a complete Fluxsense-type study of refineries in the project area and perform OGI imaging to identify storage tank leaks.	Fuel Refining strategies 2 and 3, actions 2.4., 3.13., and 3.14 focus on improving emissions and air monitoring to better characterize emissions from refineries and other related facilities, including fugitive emissions from leaks) that will consider the use of Fluxsense and other technologies.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Ensure the concerned implementation of the Draft PTCA Plan Fuel Refining Strategy Actions 3.13, 3.14, 3.15 for more robust fence line and community monitoring emissions from Chevron and other major industrial sites.	For more information about the progress of Fuel Refining actions 3.13, 3.14, and 3.15, please consider signing up for the District's Refinery Stakeholder email list at https://www.baaqmd.gov/contact-us/sign-up-for-information .

First Name	Last Name	Organization	COMMENT	RESPONSE
Jeannette	Kortz	Unknown	Plan needs full analysis of the emissions and health impacts of major flaring events.	A detailed analysis of potential flaring impacts is provided in Appendix C.
Jeannette	Kortz	Unknown	Plan needs to improve our understanding of individual emission health risks.	A detailed emissions inventory, including air toxic emissions, was developed for the community and used to support a modeled exposure assessment related to cancer and chronic health risks. Results of these analyses are summarized in Chapter 5 and Appendix C.
Jaime	Perez	Richmond resident	Urgent Action Needed: Provide a comprehensive analysis of emissions and health impacts from major flaring events, like the recent Nov 27th incident.	A detailed analysis of flaring impacts is provided in Appendix C, with a focus on potential impacts under worst-case conditions rather than specific historical events.
Tarnell	Abbott	Richmond resident	There is no analysis of the emissions and health impacts of bad flaring events such as the one in November 2023. Lacking this, the plan is incomplete and unacceptable.	A detailed analysis of flaring impacts is provided in Appendix C, with a focus on potential impacts under worst-case conditions rather than specific historical events.
Gary	Hurlburt	President and Executive Director, Richmond Tennis Association	Need a complete analysis of the Nov. 17 th flares that lasted a full 12 hours that would show the actual extent of emissions and pollutants along with remedial actions proposed and scheduled for their implementation.	A detailed analysis of flaring impacts is provided in Appendix C, with a focus on potential impacts under worst-case conditions rather than specific historical events.
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Include a complete profile of the November 27th Flaring Even (4 flares full bore for 12+ hours).	A detailed analysis of flaring impacts is provided in Appendix C, with a focus on potential impacts under worst-case conditions rather than specific historical events.
Sally	Tobin	Resident	Chevron to carry out direct measurements (smokestack monitoring) of the particulate matter and toxics given off by all smokestacks, including tankers moored to the Chevron Wharf, tugboats, and all refinery emissions.	Chevron and other facilities are currently required to monitor and test at sources included in applicable rules and their permits. Additionally, improvements to emissions monitoring for Chevron and related fuel refining facilities are a part of Fuel Refining action 3.14.
Scott	Gelfand	Richmond resident	Please consider a true analysis of the emissions and health impacts of major flaring events. They happen too often these days. It's not enough to just say it'll be fine. Reduce flaring - to health rules in 2024 -or bring accountable punishments/fines.	A detailed analysis of flaring impacts is provided in Appendix C, with a focus on potential impacts under worst-case conditions rather than specific historical events.

First Name	Last Name	Organization	COMMENT	RESPONSE
Brent	Green	Unknown	Better monitoring of emission spikes & flaring events with better alerts.	Please see Fuel Refining strategies 2 and 3, actions 2.4., 3.13., 3.14 focused on improving emissions and air monitoring for refineries and other related facilities. Improving the transparency and communication of data is also a focus of Fuel Refining actions 2.2 and 3.15.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Support Strategy Actions 3.13, 3.14, 3.15.	Comment is respectfully noted.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend that BAAQMD advocate with the California Department of Toxic Substances Control (DTSC) and/or USEPA to improve air monitoring and reporting at cleanup sites, as follows: air monitoring data to be reported in real time and be presented in a form that is understandable and readily accessible to all community members; monitor for smaller particle size (PM2.5 v PM10); timely analysis to determine if dust particles carry contaminants of concern.	The Air District recognizes that contaminated sites undergoing cleanup and remediation are important concerns in the community. The Air District coordinates routinely with other state agencies (such as DTSC) and federal agencies (such as EPA) that have jurisdictional authority or oversight with site cleanup and remediation. The Air District is continually working to improve these stakeholder connections to help enhance monitoring study design, data accessibility, and communication of air monitoring results.
Y'Anad	Burrell	Resident, CSC co-chair, Glasshouse Communications	Fuel Refining 3.9 (pg. 99) - 50% - 100% of the penalty money will be invested back by Chevron. Additionally, there is no clarity on what 'body' will be the oversight group for the Community Benefits Policy. Members should be majority community members.	Fuel Refining strategy 2 includes information about the Just Transition Policy and oversight of Community Benefit Policy funds.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend that CERP consider adding a measure to begin planning refinery phaseout.	Please see Fuel Refining strategy 1, including action 1.1 and 1.2.
Todd	Osterberg	Chevron	Just Transition Principles are out of scope of "reducing emissions of toxic air contaminants and criteria air pollutants in overburdened communities".	Comment is respectfully noted.
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	FR 3.9 - community benefits policy guided by Just Transition Principles - we need language similar to this throughout the CERP. FR 5 (Reduce Exposure and Health Impacts) - make all newly collected data on refinery emissions publicly accessible in multiple languages and work with Just Transition Subcommittee to explore how the outcomes of emissions and public health studies would legally and politically support a transition away from fossil fuels District-wide.	Please refer to Fuel Refining strategy 2, actions 2.2 and 2.4.
Jeannette	Kortz	Unknown	Plan needs to investigate legislative strategies for reducing pollution.	As noted in Chapter 9, a Legislative Ad Hoc Committee is proposed to organize CSC support for legislative proposals that protect public health and reduce air pollution.

First Name	Last Name	Organization	COMMENT	RESPONSE
Brent	Green	Unknown	Plan must be strengthened. Stronger regulation of emissions.	Comment is respectfully noted.
Joseph	Puleo	Resident	Has BAAQMD any plan to pursue other avenues such as legislation, regulation or other legal venues?	As noted in Chapter 9, one of the proposed committees is the Legislative Ad Hoc Committee that would organize CSC support for legislative proposals that protect public health and reduce air pollution.
Todd	Osterberg	Chevron	There must be underlying legal authority to conduct the actions in the Plan, including suggestions for permitting, emissions, and flaring activities.	Comment is respectfully noted.
Leticia	Chavez	North Richmond resident	Bloom of warehouses with big trucks will make area unlivable. Electrifying vehicles will not solve problems.	Comment is respectfully noted. Please see Mobile strategy 1, Actions 1.1 through 1.4.
Leticia	Chavez	North Richmond resident	Lots of cars and trucks like to avoid Richmond Parkway traffic and go into our residential/neighborhood streets when not supposed to. 'Thank you for work and helping our communities.	Comment is respectfully noted.
Jenny	Delumo	Resident	Strategy Mobile 5: Consider including an action that incentivizes and supports the development of electric vehicle (EV) charging for public use. This could be through shared infrastructure or land use zoning that encourages new multi-family development to include EV charging infrastructure if that development includes vehicular parking spaces.	Business and fleets are eligible for Air District electric vehicle charging infrastructure grants. To learn more please visit https://www.baaqmd.gov/funding-and-incentives/businesses-and-fleets/infrastructure .
Jenny	Delumo	Resident	Strategy Mobile 6: consider including actions that would encourage the development of infrastructure that makes walking and biking safer, and therefore a more desirable mode of transportation (for example, high visibility crosswalks , protected bike lanes, etc.).	Please see Mobile strategy 2, action 2.2.
Jan	Warren	Resident (Walnut Creek)	The Mobile 4 strategy actions for street sweeping needs some promoting, or incentivizing. I recently heard about a city that had access to some environmental funds and so they bought a street sweeping machine. It's now not being used because people wouldn't move their cars.	Comment is respectfully noted.
Daniel	Lanis	Resident	Support, with particular interest for mobility options of cyclists and pedestrians.	Comment is respectfully noted.
Catalin	Kaser	Resident	Eager to see better bike and pedestrian infrastructure put into place, including traffic calming measures.	Comment is respectfully noted.

First Name	Last Name	Organization	COMMENT	RESPONSE
Steve	Early	Richmond resident, author of Refinery Town: Big Oil, Big Money, and the Remaking of an American City (Beacon Press, 2017)	Marine vessels/shipping containers. Why can't we do what Port of Oakland does, shift from burning diesel fuel to electric power when vessels are docked?	Please see Marine & Rail action 2.1 with respect to CARB's At Berth Regulation.
Suzanne	Gordon	Point Richmond resident	Everyday see 4 tankers docked at Chevron wharf, burning diesel fuels. when will BAAQMD and CARB do something? Port of Oakland required shore power conversion many years ago. We need regulatory action soon!	Please see Marine & Rail action 2.1 with respect to CARB's At Berth Regulation.
Gary	Hurlburt	President and Executive Director, Richmond Tennis Association	Chevron need shore power to tankers idling at the wharf.	Please see Marine & Rail action 2.1 with respect to CARB's At Berth Regulation.
Sally	Tobin	Resident	Chevron stop its delaying tactics and install "shore power" on the Chevron Wharf.	Please see Marine & Rail action 2.1 with respect to CARB's At Berth Regulation.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Shore power must be available by 2027, and all vessels must use shore power by 2032.	Please see Marine & Rail action 2.1 with respect to CARB's At Berth Regulation.
Brent	Green	Unknown	More effective penalties & enforcement.	Please see Fuel Refining strategy 3 legal and enforcement actions; Also See Compliance & Enforcement strategy.
Tarnell	Abbott	Richmond resident	If big fines were imposed, would they upgrade their equipment to prevent flaring?	Please see accountability actions in Fuel Refining strategy 3 and flaring actions in Fuel Refining strategy 2.
Sally	Tobin	Resident	Include financial consequences for Chevron in document.	Please see accountability actions in Fuel Refining strategy 3.
Joseph	Puleo	Resident	Fining Chevron is useless. Any such fine is just absorbed as a minor cost of doing business.	Please see accountability actions in Fuel Refining strategy 3.
Todd	Osterberg	Chevron	Enforcement is not a public process.	Comment is respectfully noted.
Sally	Tobin	Resident	Strict consequences for Chevron, penalties for future noncompliance, project milestones, progress updates. Add teeth to plan!	Please see accountability actions in Fuel Refining strategy 3.

First Name	Last Name	Organization	COMMENT	RESPONSE
Leticia	Chavez	North Richmond resident	Can someone check on truck businesses to comply? See many parked where not supposed to. Specifically, Pittsburg Ave/Fred Jackson (North Richmond), by Verde School.	Please see Mobile actions 3.1 and 3.2, and visit CARB's online complaint system at https://ww2.arb.ca.gov/environmental-complaints .
Brent	Green	Unknown	More accountability for major sources. More accountability for BAAQMD. More accountability for CARB.	Accountability is a theme throughout the plan, discussed especially in Fuel Refining strategy 3.
Laurie	Swiadon	East Richmond Heights resident	Complaints around woodsmoke fireplaces w/o EPA filters.	Please see Health action 2.5.
Laurie	Swiadon	East Richmond Heights resident	Plan does not include ban on unfiltered fireplaces.	Please see Health action 2.6.
Scott	Gelfand	Richmond resident	Legislative strategies for reducing pollution such as limits on exports or requirements to process cleaner crude oil with lower sulfur content. Again - the business must adhere to the community health around it. It cannot do business as usual.	Comment is respectfully noted.
Suzanne	Gordon	Point Richmond resident	Need a Rule 11-18 with stronger benchmarks and special focus on hazardous Richmond refinery by-products. Currently, will take too long and is vague in details/milestones.	Please see Fuel Refining action 4.1.
Steve	Early	Richmond resident	Need legislative policies to regulate, make best available technology, set limits to reduce fuel refining permitted, require fuels be made from cleaner feedstocks.	Comment is respectfully noted.
Jaime	Perez	Richmond resident	Investigate legislative strategies for pollution reduction, including export limits and cleaner crude oil requirements.	Comment is respectfully noted.

First Name	Last Name	Organization	COMMENT	RESPONSE
Jaime	Perez	Richmond resident	No exploration of non-traditional regulatory approaches, such as export limits and cleaner feedstocks, to expedite pollution reduction.	Comment is respectfully noted.
Floy	Andrews	Attorney in Richmond, CA	Chevron, must install wet gas scrubbing technology.	Please see Fuel Refining action 5.1.
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	PTCA CERP is missing an updated Refinery Storage Tanks regulation, recently adopted by SCAQMD last year. Urge to update.	Please see Fuel Refining action 4.5.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend that BAAQMD adopt an updated Refinery Storage Tank regulation to address fugitive VOCs.	Please see Fuel Refining actions 4.5.
Jan	Warren	Resident (Walnut Creek)	Under strategy 5, please add Veolia wastewater treatment plant since excessive ongoing flaring of hydrogen sulfide continues, with no public notifications to the public, enforcement measures, or assurance that the causal issues have been resolved.	Please see Commercial & Industrial action 4.6.
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Beef up Rule 11-18. Pass amendments by end of 2024. Model the impact of tightening the chronic health & cancer risk thresholds in Rule 11-18 by 20% and 30%.	Please see Fuel Refining action 4.1.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Create an updated Refinery Boilers and heaters regulation (SCAQMD Rule 1109.1). This rule requires addition of Selective Catalytic Reduction (SCR) on most refinery heaters, boilers, and other combustion units.	Please see Fuel Refining actions 4.5 and 5.5.
Jan	Warren	Resident (Walnut Creek)	Update odor rule to adapt the reporting form to include check off boxes. People can't always describe what they're experiencing; however, they know what they're feeling. Add terms like headaches, nausea, eye irritation, breathing difficulties, metallic taste in mouth, heavy air. Ask those on PTCA to help describe other experiences.	While the rule does not need to be changed in order to update the complaint reporting form, complaint reporting is addressed in the plan. Please see Compliance and Enforcement action 1.1 about the Complaints system, including evaluation of community-identified improvements to the system.
Joseph	Puleo	Resident	A denial of the use of cheaper high Sulphur feed stock, rather than a fine, would pose a serious penalty to Chevron's bottom line.	Comment is respectfully noted.
Tarnell	Abbott	Richmond resident	Plan needs significant improvement to strengthen it such as more and better analyzed data, tougher strategies, and more milestones with goals.	Comment is respectfully noted.

First Name	Last Name	Organization	COMMENT	RESPONSE
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	Commend commitments to update specific refinery regulations, including: refinery combustion sources and flare regulations.	Comment is respectfully noted.
Janet	Johnson	Co-coordinator, Sunflower Alliance	Recommend that the Air District upgrade the Rule 11-18 priority of Richmond Wastewater Treatment Plant from "medium" to "top".	The Richmond Wastewater Treatment Plant is currently a Phase II facility based on emissions and risk-based prioritization scores. Phase II facilities were assigned a ranking based on the current prioritization score (> 100 = Top, 50-100 = Medium, and 10-50 = Low). These rankings are a guide and will be reassessed each year. We appreciate your input.
Kanwal	Waknis	Physician at Lifelong Medical's William Jenkins Clinic	Express my support for this plan overall. Appreciate Chapter 7 - Strategy 4 Large Industrial Sources. Believe that reducing particulate matter and toxic air contaminant emissions from large facilities will help to reduce health hazards.	Comment is respectfully noted.
Niyi	Omotoso	Physician	Wholly support PTCA plan. Support just transition principle. Support public health strategies.	Comment is respectfully noted.
Yadira	Alvarez	Unknown	Supports the plan.	Comment is respectfully noted.
Janis	Hashe	Richmond resident	Supports the plan.	Comment is respectfully noted.
Susan	Wehrle	Richmond residents	Supports the plan.	Comment is respectfully noted.
Jackelyn	Ledesma	Richmond resident	Supports the plan.	Comment is respectfully noted.
Joel	Iniguez	Unknown	Supports the plan.	Comment is respectfully noted.
Jennifer	Mourelatos	Lifelong Medical Care Director	Supports the plan.	Comment is respectfully noted.
Megan	Goetz	Lifelong Medical Care, Americorps Fellow	Supports the plan.	Comment is respectfully noted.
Jacob	Rico	Resident	Supports the plan.	Comment is respectfully noted.
Angel	Chavarin	Resident	Supports the plan.	Comment is respectfully noted.
Brenda	Illescas	Resident	Supports the plan.	Comment is respectfully noted.
Carla	Morales	Resident	Supports the plan.	Comment is respectfully noted.
Diana	Martinez	Resident	Supports the plan.	Comment is respectfully noted.
Manuel	Gomez	Resident	Supports the plan.	Comment is respectfully noted.

First Name	Last Name	Organization	COMMENT	RESPONSE
Karen	De La Cruz	Resident, youth council	Supports the plan.	Comment is respectfully noted.
Hazel	Padilla	Resident	Supports the plan.	Comment is respectfully noted.
Jenny	Delumo	Resident	Support the plan; thanks for engaging with the community to prepare a thoughtful detailed report.	Comment is respectfully noted.
Maureen	Brennan	Hazmat Commissioner	Support the plan; formative and comprehensive; thoughtful; spreads the blame around; It's not just the refinery with toxic emissions, but a variety of sources, that create health harms; workable solutions.	Comment is respectfully noted.
Jan	Warren	Resident (Walnut Creek)	Plan does a great job of educating the community, showing the history and ongoing harm from pollution that has negatively impacted the health of residents for generations.	Comment is respectfully noted.
Julie	Harris	Nurse in El Sobrante	Please make PTCA happen. See lots of children with asthma in community.	We appreciate you sharing your personal experience working in the Path to Clean Air area. Thank you and your comment is respectfully noted.
Suzanne	Coffee	CSC member / resident	Commitment to represent the voice and the needs of the community is it's greatest strength of this plan.	Comment is respectfully noted.
Martine	Johanessen	NorCal Staff Researcher, Communities for a Better Environment	Excited to see "Move Towards a Just Transition".	Comment is respectfully noted.
Steve	Early	Richmond resident	Chevron Modernization project (BAAQMD approved) not working. 8/10 top TAC pollutants for chronic health risk have increased significantly, with sulfuric acid up 275% from 2019-2021.	Differences in the 2019 and 2021 Chevron emissions shown in the Draft PTCA Plan reflect changes in methods and data (e.g., findings from the Heavy Liquids Study) as well as actual emissions changes. So some apparent emissions increases actually reflect a better understanding of emissions.
Todd	Osterberg	Chevron	Inaccurate statements about Chevron's Richmond facility: # of BAAQMD inspectors assigned to the Refinery is incorrectly stated on page 59. BAAQMD has six inspectors dedicated to the Refinery, four full-time and two part-time inspectors.	Comment is respectfully noted.
Laurie	Swiadon	East Richmond Heights resident	Air quality complaint confirmation rates exclude woodsmoke complaints	Comment is respectfully noted.

First Name	Last Name	Organization	COMMENT	RESPONSE
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Provide a list of all emission-related penalties of \$5k or more over the last 5 years, including firm, date of violation, and specific violation.	The purpose of the public comment period for the Draft Plan was to allow members of the public to provide input by submitting written feedback to the Air District regarding the Draft Plan. Please be aware that the question raised does not constitute a public comment, but rather a request for documents, which may or may not exist. Such document requests should be made via the Air District's Public Records Act requests portal https://www.baaqmd.gov/contact-us/request-public-records .
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	What were the 841 Title V permit violations in 2019-2022 about? What enforcement actions have been taken? What's the plan for compliance in this area?	The purpose of the public comment period for the Draft Plan was to allow members of the public to provide input by submitting written feedback to the Air District regarding the Draft Plan. Please be aware that the question raised does not constitute a public comment, but rather a request for documents, which may or may not exist. Such document requests should be made via the Air District's Public Records Act requests portal https://www.baaqmd.gov/contact-us/request-public-records .
Todd	Osterberg	Chevron	Inaccurate statements about Chevron's Richmond facility: Key Issue 2 on page 91 states that there is a "lack of accountability with respect to compliance with Air District Regulations" because "86% of Air District Notices of Violations within the PTCA area are associated with Chevron and other fuel-refining related sources.	Comment is respectfully noted.
Suzanne	Gordon	Point Richmond resident	BAAQMD needs to be involved in Chevron refinery "modernization plan", as well as PM2.5 reduction.	Comment is respectfully noted.
Joseph	Puleo	Resident	2014 Chevron Refinery Modernization Plan approved by BAAQMD has produced higher amounts of toxic elements.	Trends in Chevron emissions reflect changes in methods and data as well as actual emissions changes. So some apparent emissions increases actually reflect better understanding of emissions.
Janet	Johnson	Co-coordinator, Sunflower Alliance	List of all refinery combustion sources (boilers, heaters, furnaces, etc.) that include size and emissions should be made available to CSC.	The CSC was provided a detailed emissions inventory for the community, including process-level emissions at Chevron and other permitted sources.

First Name	Last Name	Organization	COMMENT	RESPONSE
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Discuss the health impacts of the significant 2019 to 2021 increases in 8 of 10 of the most dangerous TAC emissions from the refinery and their legal fight against the Cat Cracker wet scrubber rule (6-5) with Chevron senior management.	Differences in the 2019 and 2021 Chevron emissions shown in the CERP reflect changes in methods and data (e.g., findings from the Heavy Liquids Study) as well as actual emissions changes. So some apparent emissions increases actually reflect better understanding of emissions.
Trina	Jackson-Lincoln	City of Richmond City Council Liaison and Project Coordinator	Provide a list of all permitted facilities whose emissions are included in our current emissions inventory reports.	There are 303 permitted sources in the community, and they were not listed individually because many are smaller sources like backup generators and gas stations (see Figure 6-1). Key permitted sources identified as community concerns are listed in Table 5-5.
Todd	Osterberg	Chevron	Inaccurate statements about Chevron's Richmond facility: Table 5-11 lists emissions associated with Chevron Refinery.	Page C-3 of Appendix C describes data sources for the Chevron emissions inventory and provides context for why the emissions shown in the Draft PTCA Plan may not match other existing data (e.g., the Rule 12-15 inventory).
Todd	Osterberg	Chevron	Plan should recognize the significant progress Chevron has made regarding emissions reductions, including from Chevron Modernization Plan (page. 21).	For all emissions sources, the Draft PTCA Plan focused on current conditions rather than trends, which are influenced by updates in emissions estimation data and methodologies as well as actual emissions changes.
Todd	Osterberg	Chevron	Should be deleted: Appendix B states that Chevron "emits more fine particulate matter and sulfur dioxide than all other contribution sources in our community combined." Sentence not supported by Analysis in Chapter 5.	Table 5-7 shows that Chevron emits 473 tons per year (tpy) of PM2.5 and 322 tpy of SO2, which are more than half of the total emissions shown in Table 5-6 (756 tons of PM2.5 and 587 tons of SO2). That is the basis for the statement in Appendix B.
Todd	Osterberg	Chevron	Areas where Plan includes data without citations: "approximately half of harbor craft and other marine vessel activity in the PTCA area are connected to Chevron and other fuel refining operations". Unclear how this was determined.	This statement was based on 2019 vessel call data from the Marine Exchange, which shows over half (54%) of vessel calls going to Chevron.

First Name	Last Name	Organization	COMMENT	RESPONSE
Gail	Eierweiss	Resident	<p>Better data, analysis milestones on TACs; BAAQMD says it does not know what toxic elements are released in major flaring events or what emission reductions will be delivered by Rule 11-18.</p> <p>No public information describing what the Nov. 27 emissions were, their potency or their dispersal; no focus on health impacts from the changes in "regular" operational emissions.</p> <p>Since "modernization" there may have been increases in 8 of the 10 most dangerous TAC emissions for chronic health, yet plan is silent on impacts. How damaging was a 225% increase in sulfuric acid from 2019 to 2021? Did these emissions go up more in 2022 and 2023? Better understand sources of these top 10 pollutants.</p>	<p>Trends in Chevron emissions reflect changes in methods and data as well as actual emissions changes. So some apparent emissions increases actually reflect better understanding of emissions.</p>
Todd	Osterberg	Chevron	<p>Mischaracterization of pollutants: page 40, ammonia is not a Criteria Air pollutant. It is a Toxic Air Contaminant.</p>	<p>The Air District has the authority to regulate ammonia as a criteria air pollutant since ammonia is a precursor of PM2.5, in addition to regulating it as a toxic air contaminant.</p>
Todd	Osterberg	Chevron	<p>Mischaracterization of pollutants: page 91, Plan incorrectly describes PM2.5, NOX, and SOX as "toxic emissions".</p>	<p>In the Draft PTCA Plan "toxic" is being used as an adjective meaning harmful, not implying the regulatory category of air toxics. In addition, many components of PM2.5 are regulated as air toxics and all have health effects.</p>
Todd	Osterberg	Chevron	<p>Mischaracterization of pollutants: Plan discusses manganese emissions throughout document, but fails to acknowledge that in HRAs manganese does not significantly contribute to health risks since little toxicity.</p>	<p>As noted on page 45 of the Draft PTCA Plan, in the toxicity-weighted emissions (TWE) inventory for the community, manganese was the leading contributor to chronic TWE.</p>
Todd	Osterberg	Chevron	<p>Mischaracterization of pollutants: Table 5-10 shows emissions from selected TACs and includes acrolein. CARB has identified that there is currently no CARB-approved test method from acrolein from stationary sources and BAAQMD should exclude from final HRA results.</p>	<p>California Office of Environmental Health and Hazard Assessment (OEHHA) has established a chronic reference exposure level (REL) for acrolein, which is why it was included in the air toxics inventory and toxicity-weighted emissions. In addition, there are robust way to test for acrolein, even in the absence of CARB-approved methods.</p>

First Name	Last Name	Organization	COMMENT	RESPONSE
Todd	Osterberg	Chevron	Areas where Plan includes data without citations: Figures 5-22 and 5-25.	Figure 5-22 was taken from the Rule 6-5 analysis, as noted in the footnote at the bottom of page 53. Figure 5-25 and related figures were developed from emissions and modeling data described in Chapter 5 and Appendix C.
Todd	Osterberg	Chevron	Areas where Plan includes data without citations: "Source Attribution Analyses". Plan should include a citation for documentation of what these areas of concern are and when they were identified by the community.	Please see Chapter 7 (page 80) for a description of the process used to develop the list of community concerns.
Todd	Osterberg	Chevron	Appendix C: page C-8, there is no 5-10 minute standard for SO2.	The sentence on 5-10 minute exposures is noting the findings about health impacts from short-duration exposures from EPA's SO2 NAAQS revision, and the Air District's modeling analysis was limited to 1-hour SO2 concentrations, the same as the NAAQS. Also, due to the preliminary information about the health impacts of short duration SO2 exposure as noted in Appendix C, EPA requires Agencies to report maximum 5 min concentrations of SO2 each hour for ambient SO2 monitoring to build the dataset to support health studies to inform future NAAQS revisions.
Todd	Osterberg	Chevron	Appendix C: page C-10, "Insights from modeling can sometimes be corroborated...". This statement appears to dismiss monitoring data. Actual monitoring data, where available, should always take precedence over modeling results.	Neither modeling nor monitoring take precedence in every circumstance as they are each technical tools that provide different types of air quality information. As such, they should be used for appropriate purposes and the results interpreted correctly.
Todd	Osterberg	Chevron	Appendix C: page C-10, "numerous occurrences of hourly SO2 concentrations above typical hourly levels were observed, including some occurrences of hourly concentrations approaching 75 ppb." Dismissing ambient monitoring data from BAAQMD or Chevron monitors in favor of modeling data is not a sound approach.	Appendix C states that modeled SO2 concentrations represent potential impacts that could occur under the right set of conditions, not historic events that were captured by monitoring.
Todd	Osterberg	Chevron	Mischaracterization of pollutants: page 51 discusses chronic HI levels. Plan should acknowledge that these chronic HI levels are 10 times below any benchmark level of concern. Plan should use phrase "health hazard" instead of "health risk". Change should also be made on page 54.	Exposure results focus on average residential values attributable to local emission sources only, not maximum impacts. It is inappropriate to compare these results to benchmarks that are geared toward the maximally exposed individual.

First Name	Last Name	Organization	COMMENT	RESPONSE
Todd	Osterberg	Chevron	Areas where Plan includes data without citations: wherever there are references to Chevron Richmond refinery emissions.	Chevron emissions were assembled from multiple data sources, as described on page C-3 of Appendix C.
Todd	Osterberg	Chevron	Areas where Plan includes data without citations: Figure 5-19. Any data depiction of hazard index should include source and date of data.	Figure 5-19 and related figures were developed from emissions and modeling data described in Chapter 5 and Appendix C.
Todd	Osterberg	Chevron	Mischaracterization of pollutants: Figure 5-16 shows benzene concentrations for January through March 2022. BAAQMD should be wary of drawing conclusions from a limited data set.	The time period of the benzene measurements shown in Figure 5-16 (sixteen drive periods from January to April 2022) corresponds to the period of the air toxics monitoring study using the Air District's air monitoring van. As noted by the commenter, this study was comprised of a set of individual days or snapshots of what the levels of pollutants are throughout the PTCA area and CAMP focus areas. Since the District has limited information about the frequency or persistence of the observations from these studies, no conclusions were made that assumed these patterns were constant, nor were the conclusions inconsistent with the use of air quality information that has limited temporal coverage.
Todd	Osterberg	Chevron	Appendix D: pages D-1 and D-2, monitors operated by PSE Health Energy are omitted from the "Background and Resources on Air Monitoring Programs And Projects section.	The PSE monitoring and other projects were part of the CAMP, which informed the key issues of the Draft PTCA Plan. The Air District offered to include data from each of the CERB-funded air monitoring projects in the Draft PTCA Plan, and while PSE declined, the findings from their monitoring are consistent with the issues identified in the Draft PTCA Plan and what is observed by the other PM2.5 air sensor networks in the PTCA area. For more information about the PSE Health Energy and APEN network, that project and others as sources of air quality data in the PTCA area are listed on page 2 of the CAMP.
Todd	Osterberg	Chevron	Appendix D: pages D2, "the air sensors from Groundwork Richmond...". Given that these low-cost air sensors do not undergo same QA/QC standards as Air District sensors, Plan should not make assumptions using this data.	Data from air sensors and other secondary data sources are used appropriately, along with other creditable evidence as an indication of the variation and distribution of PM2.5 levels in the PTCA area.

First Name	Last Name	Organization	COMMENT	RESPONSE
Todd	Osterberg	Chevron	<p>Appendix D: page D-3, "data from the refinery ground level monitors are not subject to the NAAQS since they are a facility fenceline...".</p> <p>Data gathered by ground level monitor (GLMs) cannot be compared to the NAAQS.</p>	<p>The Draft PTCA Plan indicates that the Ground Level Monitors (GLMs) are not comparable to the NAAQS for determining nonattainment since they are inside the facility fenceline. However, GLM data are comparable to emission limits in Regulations 9-1 and 9-2, and also can provide information about emissions that may affect areas beyond the fenceline.</p>
Todd	Osterberg	Chevron	<p>Appendix D, page D-6, "Chevron operates fenceline air monitoring systems for compliance with Air District Regulation 12, Rule 15.</p> <p>These GLMs were installed for compliance with BAAQMD Rules 9-1 and 9-2 prior to the existence of Rule 12-15.</p>	<p>Ground level monitors and the underlying applicable regulations (Regulations 9-1 and 9-2) are discussed in Appendix D, page D-2. While the GLMs originally operated to meet the requirements of 9-1 and 9-2, Chevron has also opted to include one of the GLMs as part of the fenceline monitoring system to meet Regulation 12-15 requirements.</p>
Todd	Osterberg	Chevron	<p>Appendix D: page D-6, "under an agreement with the City of Richmond, Chevron also operates three community air monitoring sites that provides measurements for several pollutants...".</p> <p>Change to: Chevron also funds the third-party operation of these monitors at the Company's discretion.</p>	<p>It is the Air District's understanding that Chevron and their contractor operate the Community Monitoring Stations (including funding) initially as part of an agreement with the City of Richmond.</p>